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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION
CHARLENE CARTER)
)
) CIVIL ACTION NO.
VS.) 3:17-CV-02278-X
)
SOUTHWEST AIRLINES CO., AND)
TRANSPORT WORKERS UNION OF)
AMERICA, LOCAL 556)

CONFIDENTIAL
TWU LOCAL 556 30(b)(6)
ORAL DEPOSITION OF
JOHN PARROTT
NOVEMBER 30, 2020

ANSWERS AND DEPOSITION OF JOHN PARROTT,
produced as a witness at the instance of the
Plaintiff, taken in the above-styled and -numbered
cause on NOVEMBER 30, 2020, at 1:52 p.m., before
CHARIS M. HENDRICK, a Certified Shorthand Reporter
in and for the State of Texas, witness located in
Portland, Oregon, pursuant to the Federal Rules of
Civil Procedure, the current emergency order
regarding the COVID-19 State of Disaster, and the
provisions stated on the record or attached hereto.

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19 MS. LAUREN ARMSTRONG
20
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25

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PROCEEDINGS

1
2 THE REPORTER: Today's date is
3 November 30, 2020 and the time is 1:52 p.m. This
4 is the 30(b)(6) deposition of John Parrott, and it
5 is being conducted remotely in accordance with the
6 current emergency order regarding the COVID-19
7 State of Disaster. The witness is located in
8 Portland, Oregon.

9 My name is Charis Hendrick, Court
10 Reporter, CSR No. 3469. I am administering the
11 oath and reporting the deposition remotely by
12 stenographic means from my home in Ellis County,
13 Texas.

14 JOHN PARROTT,
15 having been first duly sworn, testified as follows:

EXAMINATION

16
17 BY MR. GILLIAM:

18 Q. Good afternoon, Mr. Parrott. Did -- did
19 you review any documents in preparation for today's
20 deposition?

21 A. Yes.

22 Q. And what did you review?

23 A. I looked through some financial records as
24 it pertained to the women's march. I read back
25 through to refresh myself on Charlene Carter's

grievance file. I read the arbitration decision again just to refresh my memory.

Q. Okay. Did you review any other documents in preparation for today's deposition?

A. Other than the -- the legal document as far as what needed to be spoken to today.

Q. Okay.

A. The 20 -- the 20 items that we needed to have --

Q. Okay.

A. -- witnesses for.

Q. All right. And apart from legal -- from legal counsel, did you have any communications with anyone regarding the subject matters in -- in that email -- or the message?

A. Yes.

Q. Okay. And who did you speak with?

A. Yes. I spoke with Lyn --

MR. GREENFIELD: And, John, I'm going to --

A. -- I spoke with --

MR. GREENFIELD: Hold on one second, John.

THE WITNESS: Oh, excuse me.

MR. GREENFIELD: Hold on -- hold on.

That's all right. I was on mute for a second. My apologies. I'm going to object to the extent that any of those communications happened at advice of legal counsel. But if you had any communications that weren't pertaining to advice of legal counsel to -- to speak with on any given topic, then you -- you may go ahead and testify.

A. So this was at the direction of legal counsel as it pertains to why we're here today.

Q. (By Mr. Gilliam) Okay. All right. Well, we will just move on. What is an agency fee objector?

A. An agency fee objector is a -- a member who has resigned their membership from the union, but are still paying their portion of the fees as it pertains to collective bargaining and grievance administration.

Q. Okay. And does Local 556 keep track of flight attendants who are agency fee objectors?

A. Yes, sir, we do.

Q. Okay. And when did Local 556 start keeping track of agency fee objectors?

A. I don't know the exact date when the first agency fee objectors occurred, but it's been a pretty long time.

Q. Okay. And how long did Local 556 -- all right. Let me ask it this way: When did Local 556 start keeping records of who was an agency fee objector?

A. Well, that would be the same -- actually, that's the same way. So it's -- since we've had agency fee objectors, we've tracked them, but --

Q. Okay. Now, prior to 2013, you didn't have many agency fee objectors, correct?

A. So for the longest time, we had maybe three is the -- what I remember back -- so I took -- I became a treasurer in 2009, and I believe we had about three at that point.

Q. Okay. And you -- you still keep track of who -- who is and is not -- well, I am sorry -- who is an agency fee objector today, correct?

A. Yes. Yes, sir.

Q. Okay. I'd like to mark Document 38 as, I guess, Exhibit 24.

(Exhibit 24 marked.)

Q. (By Mr. Gilliam) And, John, if -- that would be Document 38 for you.

A. Okay. Let me pull that up. I have that up.

Q. Okay. If you could just review it real

quick. And once you've had the opportunity to review it, let me know.

A. I am familiar with this document.

Q. Okay. And what is it?

A. So this is a report from our system that tells us in real time who were the agency fee objectors at that moment. So you can see that I ran that report on July 14, 2018 at 5:26 p.m. And these were the current objectors at that point, which will list their names, their employee number, if they were on the medical leave status, where they were based and at what date did they opt out.

Q. Okay. And the database stores this information?

A. That's correct.

Q. Okay. And is it correct to say that the union does not, I guess, create the report on a routine basis?

A. That would -- it could be generated on demand, but that would be correct; it would only be generated when necessary.

Q. Okay.

A. But it can be pulled up at any time.

Q. And this particular report, do you know if you generated it for a specific reason?

1 **A. So, no, I don't know the answer to that,**
2 **why -- why this was generated in 2018. I would be**
3 **speculating if I gave a reason. I don't know.**

4 Q. Okay. And who inputs the -- the data into
5 the system -- well, let me ask it again.

6 **A. That's -- so currently -- oh, go ahead.**

7 Q. Sorry. We have a little bit of a delay, I
8 think. When -- when you have someone opt out, who
9 inputs that data into your system?

10 **A. So when I receive official communication**
11 **from TW (sic) International, they send a letter to**
12 **me -- I am copied on a letter that actually is sent**
13 **to the agency fee objector stating that they are in**
14 **receipt of their letter and they have resigned**
15 **their membership. I would then go into the system**
16 **and designate them as an agency fee objector and I**
17 **would put in their opt-out date, which should**
18 **correlate to the date of their letter.**

19 Q. Okay. And does anyone else besides you
20 ever change that data?

21 **A. So that -- so with our Salesforce system,**
22 **that is field specific. And I believe that I am**
23 **the only one who can see that actual manipulation**
24 **besides an administrator. The treasurer would be**
25 **in charge of that since we've had the Salesforce**

1 **system.**

2 Q. Okay. And do you know if this document
3 correctly reflects who is an agency fee objector
4 today?

5 **A. Well, I know for certain it does not**
6 **reflect who is an agency fee objector today because**
7 **there have been additions and subtractions from**
8 **this list.**

9 Q. Okay.

10 **A. This report was ran two years ago, so**
11 **there have been people who have come off and went**
12 **back on.**

13 Q. Okay. Do you know if this list changed
14 between 2014 and 2018?

15 **A. Yes.**

16 Q. Okay.

17 **A. It would have changed between 2014 and**
18 **2018. In that four-year period, yes, it would have**
19 **changed.**

20 Q. Okay. Do you know how many total agency
21 fee objectors there are today?

22 **A. I believe -- I -- I looked at that this**
23 **morning and I believe there are 60.**

24 Q. Okay. And is -- have you -- let me ask it
25 this way: Have you ever generated this report for

1 the executive board?

2 MR. GREENFIELD: And I will instruct
3 you not to --

4 **A. Yeah.**

5 MR. GREENFIELD: -- answer on the
6 basis if that -- if that came at the behest of
7 legal counsel or advice of legal counsel to produce
8 that report for the executive board for -- for an
9 executive session -- board session.

10 **A. So I will speak to my piece that I said**
11 **yes -- and I thank you for that. And I will slow**
12 **down for -- because I think there is a delay in our**
13 **speaking.**

14 **This report would be generated monthly**
15 **to the executive board, so -- because they did not**
16 **have access to run that report.**

17 Q. (By Mr. Gilliam) Okay. And, I guess, for
18 what purposes is it -- well, strike that.

19 Now, excluding any requests from legal
20 counsel, what -- what purposes does it serve for
21 the executive board to receive this information?

22 **A. I believe it's just as a -- it's just --**
23 **it's just for informational purposes only.**

24 Q. Okay. And has -- can any other executive
25 board member run the report?

1 **A. So they -- they have that ability now,**
2 **which, basically, took away where it had to be sent**
3 **on a monthly basis. An executive board member can**
4 **now run that report.**

5 Q. How long have executive board --

6 **A. They don't -- they don't have the ability**
7 **to change the data -- oh, sorry, I didn't mean to**
8 **talk over you. They don't have the ability to**
9 **change the data, but they are able to view the**
10 **report.**

11 Q. Okay. And how long have executive board
12 members been able to view the report?

13 **A. I believe that that change was made this**
14 **year.**

15 Q. Okay. And has any executive board member
16 ever asked you to generate this report for -- other
17 than routine informational executive board
18 purposes?

19 **A. No.**

20 Q. Okay. And does the Local 556 ever send
21 any information to Southwest about flight
22 attendants' objector status?

23 **A. I am really trying to think about that to**
24 **make sure. I don't believe so, no.**

25 Q. Okay. Does Local 556 ever report any

1 information about flight attendants' nonmembership
2 status in the union?

3 **A. No.**

4 Q. Okay. Now, apart from executive board
5 members, is this report ever distributed to anyone
6 else?

7 **A. So prior to it going to executive board --**
8 **when we changed that feature, this report, I**
9 **believe, was shared with the grievance chair.**

10 Q. Okay. And for what purpose was it shared
11 with the grievance chair?

12 **A. I don't know the answer to that.**

13 Q. Okay. And objectors are reimbursed a
14 certain portion of the dues they pay; is that
15 correct?

16 **A. That's correct.**

17 Q. Okay. And how frequently are they
18 reimbursed?

19 **A. Through my interaction -- so that comes**
20 **directly from TWU International. And from my**
21 **interactions with some of the agency fee objectors,**
22 **it's my understanding that they get it quarterly.**

23 Q. Okay. And to make sure I understand, when
24 a -- I guess, a nonmember flight attendant pays
25 their dues, do they pay the full amount directly to

1 **into our account. And then we have a file transfer**
2 **that they tell us, here is what you deducted from**
3 **for this particular month.**

4 Q. Okay. And are there any restrictions on
5 the use of that money imposed by the International?

6 **A. Are you speaking to our funds in general?**

7 Q. Yes. Let me ask the question --

8 **A. So --**

9 Q. Or let me ask the question this way: Can
10 Local 556 use that money it receives however it
11 wants?

12 **A. Are you speaking about dues money in**
13 **general?**

14 Q. Yes.

15 **A. Just regular dues?**

16 Q. Yes.

17 **A. So the Local has autonomy from TWU**
18 **International. We pay a percentage of that money**
19 **to TWU per the Constitution, but the Local is**
20 **-- the executive board is the authority over how**
21 **the funds are spent.**

22 Q. Okay.

23 **A. I hope that answers your question.**

24 Q. Does the International say that the Local
25 can't use the money it receives for any political

1 Local 556?

2 **A. That's correct.**

3 Q. Okay. And how does the International
4 determine how much objectors are reimbursed?

5 **A. I believe that is stated in the agency fee**
6 **policy, that they conduct a yearly audit. And it's**
7 **based on that percentage that they are determined**
8 **what the refund percentage is on a yearly basis.**

9 Q. Okay. Now, when the -- and I am sorry.
10 Strike that.

11 So do -- do nonmember flight
12 attendants pay their dues on a monthly basis?

13 **A. Correct. All -- all members and agency**
14 **fee objectors pay monthly. Normally, I would say**
15 **greater than 90 percent of the time, it comes out**
16 **of their paychecks.**

17 Q. Okay. Now, does that money go straight
18 into the -- the union's budget?

19 **A. Yeah. So it is -- so it is wired from**
20 **Southwest Airlines to the union's general funds**
21 **account.**

22 Q. Okay. And Southwest just automatically
23 deducts the dues from the flight attendant?

24 **A. Correct. It is deducted from their**
25 **paycheck and it is wire-transferred in one lump sum**

1 purposes?

2 **A. So, yes, we do not use our dues money for**
3 **political purposes.**

4 Q. Okay. Okay. Let's see. Now, you are --
5 you are familiar that a group of flight attendants,
6 in 2017, attended a women's march in Washington,
7 correct?

8 **A. Yes, sir.**

9 Q. Okay. And was it Local 556 finances that
10 were used to fund that trip?

11 **A. So the funds -- there was a working**
12 **women's committee meeting held in D.C., and that**
13 **money that was spent came from that particular**
14 **budget.**

15 Q. Okay. And it -- was it a budget that the
16 executive board allocated for the working --
17 working -- working women's committee?

18 **A. So, yes, the -- the executive board**
19 **allotted an annual budget for a committee or a**
20 **department and they spend within the confines of**
21 **that committee.**

22 Q. Okay. And if I could mark -- or I will
23 reference you to Document 42 and mark it, if we
24 could, as Exhibit 23 -- 25.

25 (Exhibit 25 marked.)

1 **A. I am going to download that document so I**
2 **can turn it the right direction.**

3 MR. GREENFIELD: And I'm sorry,
4 Matthew, which document was that?

5 MR. GILLIAM: 42.

6 MR. GREENFIELD: 42. Thank you.

7 **A. I have Document 42 up.**

8 Q. (By Mr. Gilliam) Okay. And if you have
9 -- if you want to take a moment to look over it, go
10 right ahead.

11 **A. All right. I have reviewed the document.**

12 Q. Okay. Do you recognize it?

13 **A. I do recognize the documents.**

14 Q. Okay. And what is it?

15 **A. So the first page is a screen capture that**
16 **was done on June 21st, 2017 that details out the**
17 **expense items that were spent between November 2016**
18 **and March 2017 for the working women's committee.**
19 **So it would be committee expenses specifically for**
20 **that committee.**

21 Q. Okay. And do you prepare this report?

22 **A. This would be something that I would**
23 **prepare in my normal duties, yes, sir.**

24 Q. Okay. And, I guess, going about several
25 lines down on that first page and over towards the

1 words?

2 **A. So there is administration, general**
3 **overhead, political activities and representation.**
4 **I believe those are the categories.**

5 Q. Okay. And what is the purpose of that
6 coding?

7 **A. On this report?**

8 Q. On any report.

9 **A. So this would assist us in how we place**
10 **these expenses on our LM2; that we -- we prepare**
11 **this yearly for the Department of Labor, that LM2**
12 **report.**

13 Q. Okay. And is it exclusively -- well, let
14 me ask it this way: Does -- does it -- does the --
15 does the coding have anything to do with what a --
16 an objector is refunded?

17 **A. No, no. That has nothing to do with that.**

18 Q. Okay. Now, as treasurer, do you know why
19 these expenses were made?

20 **A. So this report captures the expenses that**
21 **related to that working women's meeting that was**
22 **held in Washington, D.C. in 2017.**

23 Q. Okay. And maybe a better way to ask the
24 question is: For instance, midway down the page,
25 it looks like there is an entry under membership

1 middle, it says, deposit.

2 **A. At the very top of the screen?**

3 Q. Yeah. It's towards the top.

4 **A. Yeah. For \$350?**

5 Q. Yes. And where does that deposit come
6 from?

7 **A. I believe that to be a refund of a deposit**
8 **that was made towards -- in travel expenses, like**
9 **69 -- I can't read the exact expense line number; I**
10 **think it's 6956, lodging. It would have been a**
11 **refund of a deposit for one of those -- probably**
12 **Line 2 or Line 3, their rental agreement or the**
13 **lodging; one of those two, but I am not certain**
14 **which one it was a refund for.**

15 Q. Okay. And what does the representation
16 mean? There is the word "representation" in the
17 column for multiple entries.

18 **A. Sure. So this would be where -- at the**
19 **time we had put that to where it would be placed on**
20 **the LM2.**

21 Q. Okay. And what does representation --
22 what does that word signify?

23 **A. So general member representation.**

24 Q. Okay. And what -- what are the other
25 options to populate that field with; what other

1 supplies; there is, like, an office supplies area,
2 membership supplies. And --

3 **A. Yes. I see that.**

4 Q. -- and it says -- I don't know --
5 30-by-108 banner plus tax. Do you know why the
6 banner was purchased?

7 **A. No, sir, I don't.**

8 Q. Okay. Now, do you -- is there any entry
9 here that reflects lost time for a flight
10 attendant?

11 **A. So towards the top of the page, if you**
12 **look under the first line of expenses, like 6350,**
13 **you will see gross lost time. And I know it's a**
14 **\$400 figure; I can't make it out fully, but it's**
15 **400 and some-odd dollars.**

16 Q. Okay. And you believe that is lost time?

17 **A. So I know that to be lost time, but that**
18 **would have been for -- I -- that would have been**
19 **for the month of January for committee work that**
20 **was done. I can't attribute this \$400 directly to**
21 **this -- this Washington, D.C. trip. It was just**
22 **what did the committee spend that month.**

23 **So you can see that -- so for January,**
24 **that was paid out in March because of how our lost**
25 **time is paid out. Anything that is -- we're**

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1 basically 60 days behind. So any work that was
2 done in the month of January is paid out in March.

3 Q. Okay. And what -- what is lost time?

4 A. So lost time is the money that we pay for
5 our members to be away from the airplane and do
6 union work.

7 Q. Okay. And it -- is it the union dues that
8 pay for the lost time?

9 A. The union dues pay for all expenses, yes.

10 Q. Okay. Does Southwest reimburse the union
11 in any way for lost time?

12 A. There are some committees that we do
13 receive reimbursements for that are joint. Mostly
14 employee assistant (sic) committees. Like, we have
15 a -- we do have a safety program that our lost time
16 is reimbursed by Southwest Airlines. Drug and
17 alcohol, our critical incident stress management,
18 professional standards. There are a few examples,
19 but this example, we would not have been reimbursed
20 by Southwest.

21 Q. Okay. Now, going to one of the next
22 pages. If you see the -- I think it's the second
23 page. In the bottom, you should see TWU 556-9489?

24 A. Give me -- let me rotate pages properly.

25 Q. This one is very difficult to read, yeah.

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1 A. Oh, yeah, this brings up -- this is an old
2 system that we use -- this is Microsoft Access;
3 this was how we transmitted pulls back in the day
4 and it -- I might have a nightmare over it tonight.

5 Q. Well, when you say this transmitted pulls,
6 what does that mean?

7 A. So to have -- so to remove flight
8 attendants from their line of flying, we had a way
9 to transmit -- between the union and Southwest --
10 these are the flight attendants that we need to do
11 union business. So this was the system that
12 repairs -- excuse me -- prepares the reports that
13 we submitted over to Southwest to pull them from
14 their flying schedule.

15 Q. Okay. And do you know if pages that ended
16 in 9489 through 9492 are all pulls that Local 556
17 transmitted to Southwest in January of 2017?

18 A. So, yes, these reflect, accurately, pulls
19 that we would have submitted over to Southwest
20 Airlines, yes.

21 Q. Okay. And do you know if those pull
22 transmittals are automatically granted by
23 Southwest?

24 A. They are, yes.

25 Q. Okay. And is that required under the

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1 collective bargaining agreement?

2 A. There is language in the collective
3 bargaining agreement that allows the union to have
4 members perform union activities, so, yes.

5 Q. Okay. And do you know if any other flight
6 attendants were pulled apart from the ones that are
7 in these pull transmittals?

8 A. I am thinking through how you asked that
9 question. Can you -- can you ask it another way?

10 Q. Yeah. So do you know if any other flight
11 attendants were pulled for the January 2017 women's
12 march than the ones who are identified in one of
13 these screenshots?

14 A. I believe this is a complete picture of
15 the flight attendants that were pulled from flying
16 to attend the working women's committee meeting in
17 January.

18 Q. Okay. Now, if you look at -- it's
19 probably on several of these, but on 9490, for
20 instance, the one that ends TWU 556-9490, there is
21 a -- an approved by field; do you see that?

22 A. Yes, I do.

23 Q. And I -- I believe it says, approved by
24 Parrott/Stone; is that correct?

25 A. Yes, sir.

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1 Q. Okay. And what is being approved exactly?

2 A. So that is for an internal process that
3 two officers have signed off on this particular
4 pull.

5 Q. Okay. Does Local 556 always require that
6 at least two officers sign off?

7 A. Yes.

8 Q. Okay. All right. And then I think there
9 is a box just to the right of that that may say,
10 additional info?

11 A. Yes, I see that.

12 Q. And does that say, pull three-day reserve?

13 MR. GREENFIELD: Objection. Vague --

14 A. That -- that does -- that box that you're
15 looking at on nine --

16 MR. GREENFIELD: Which -- which
17 document are you talking about?

18 MR. GILLIAM: Sorry. 490. The one
19 that ends TWU 556-9490.

20 A. Where a flight attendant with the first
21 name Leslie? It looks like Leslie. It's very
22 grainy.

23 Q. (By Mr. Gilliam) Sorry. I -- I cannot
24 tell on my copy. Let me see if I can pull it up
25 here real quick and make sure we're looking at the

1 same thing. Yes.

2 **A. Okay.**

3 Q. And what -- what does pull three-day
4 reserve mean?

5 **A. So that box that you are describing is**
6 **we're giving information to Southwest on what we're**
7 **actually asking for. So in that box, we're saying**
8 **that we're pulling a three-day reserve block that**
9 **is on the flight attendant's screen; and to place**
10 **the union bar as indicated, which, on the left**
11 **side, you will see that we placed a -- so paid**
12 **trips is for zero. So we pulled a reserve block**
13 **without pay for this flight attendant to attend the**
14 **working women's committee meeting.**

15 Q. Okay. So does that mean that the flight
16 attendant is not paid by Southwest for that time?

17 **A. That's correct. Nor TWU 556; they were**
18 **not paid at all.**

19 Q. Okay. And when you say TWU 556 was not
20 paid at all, who -- who would they be paid by if a
21 flight attendant is pulled?

22 **A. I am just saying that we -- we are**
23 **generating no pay off of this pull. It's a pull**
24 **without pay. So there is just no pay associated**
25 **with this pull. Sorry, I didn't answer that**

1 **correctly.**

2 Q. Okay. And did you say you are asking to
3 place the union bar as indicated?

4 **A. Correct. So still staying on that**
5 **graphic, if you look at the top in the middle**
6 **portion, it says -- and I can't make it -- the top**
7 **line is -- I know what it is; it is date of**
8 **something, but 1/19/2017. We are placing the bar**
9 **there and we're going for three days. The return**
10 **to work is one day after the date in question. So**
11 **if the bar ran January 19th, 20th and 21st, that**
12 **says 1/19/2017 and 1/22, that tells Southwest I**
13 **only want to place a three-day bar on their screen.**

14 Q. Okay. And by bar, does that mean the
15 length of the time the flight attendant is pulled?

16 **A. Right. How are we drawing this on their**
17 **flight attendant screen? So we're placing a**
18 **three-day union bar on their screen for zero TFP.**

19 Q. Okay. And what does TFP stand for?

20 **A. Trip --**

21 Q. Did you say -- I am sorry. Did you say
22 trips for pay?

23 **A. Yes.**

24 Q. Okay. And who from Southwest receives
25 this information when it's transmitted?

1 **A. I don't believe that changed, even since**
2 **2017. So this is sent via email to a distribution**
3 **group at Southwest, which is their schedule and**
4 **audit team, such as a department over in Southwest**
5 **inflight operations that processes our union pulls.**

6 Q. Okay. All right. Now, did you prepare
7 each one of these individual transmittals?

8 **A. I am going to have to say yes because I**
9 **was the only one that pretty much did all of them,**
10 **so -- so, yes.**

11 Q. Okay. Who told you the names of the
12 flight attendants to prepare the transmittals for?

13 **A. So I get -- well, so our current system is**
14 **-- so we get an email into our operational email**
15 **box telling us to pull so-and-so flight attendant**
16 **for union business. But the system is currently**
17 **changed from where we are today. So it was emailed**
18 **during this time frame; and then today, we get them**
19 **via Salesforce, which is our provider.**

20 Q. Okay. And who emailed the flight
21 attendants who would be pulled to you?

22 **A. I would say that this came from the WISE**
23 **committee.**

24 Q. Okay. All right. And if I could refer
25 you to Document 16.

1 MR. GREENFIELD: I don't think he has
2 that, so let me email that to him.

3 MR. GILLIAM: Okay.

4 MR. GREENFIELD: Okay. It's on the
5 way to you, John.

6 **A. Okay. I have that document up.**

7 Q. (By Mr. Gilliam) Okay. And if you want
8 to take a moment to review it. Once you have
9 reviewed it, let me know.

10 **A. Okay. I have read the document.**

11 Q. Okay. Do you recognize this?

12 **A. No. I mean, I recognize some of the**
13 **numbers that -- they -- they correlate to the sheet**
14 **that we just looked at earlier, but I am not**
15 **familiar with this document.**

16 Q. Okay. And we will skip over that one.
17 Now, do you know how many union members attended
18 the women's march?

19 **A. I believe it was somewhere close to 20.**

20 Q. Okay.

21 **A. I don't know the exact number. Hold on a**
22 **minute.**

23 Q. Sorry about that. Now, were you involved
24 at all in -- in Local 556 -- well -- well, let me
25 ask it this way: Are you familiar that Charlene

1 Carter served requests for document production on
2 Local 556?

3 **A. Yes.**

4 Q. Okay. And did you assist in any of the
5 document production efforts?

6 MR. GREENFIELD: And, Matthew, I think
7 if this is -- what is helpful is, I think, for
8 purposes of 17, Mr. Parrott will be testifying to
9 the interrogatory part. Andrew Kennedy will be
10 testifying to the request-for-production part.
11 Mr. Parrott is the individual who signed the
12 verification for the interrogatories.

13 MR. GILLIAM: Okay.

14 MR. GREENFIELD: I -- and -- if that's
15 the number that you are diving into right now.

16 MR. GILLIAM: Well, and let -- let me
17 ask another -- another question.

18 Q. (By Mr. Gilliam) Mr. Parrott, were you
19 involved at all in collecting any documents for
20 Local 556's production of information held on
21 certain union officials' personal electronic
22 devices?

23 MR. GREENFIELD: Mr. Gilliam, that's
24 not part of what Mr. Parrott has been designated
25 for to discuss today.

1 MR. GILLIAM: But I do want to
2 identify and -- you know, identify certain
3 documents. So if there's -- I assume somebody will
4 be able to help me with that.

5 MR. CLOUTMAN: I guess my question is:
6 Are you distinguishing between the document search
7 from your request for production and your
8 subsequent request for personal devices?

9 MR. GILLIAM: I'm -- I'm really not.
10 I just to want make sure that it is the same
11 designee.

12 MR. CLOUTMAN: That's my confusion; I
13 -- I am not sure it is.

14 MR. GILLIAM: Okay.

15 MR. CLOUTMAN: Adam -- Adam, you and I
16 should talk about that.

17 MR. GREENFIELD: Okay. Can we go off
18 the record for five minutes?

19 MR. GILLIAM: Yeah. Let's go off the
20 record.

21 (Recess taken.)

22 MR. GREENFIELD: Okay. We -- we're
23 just back from a short break in which we were
24 discussing the corporate representative being
25 identified to speak to Topic 17; specifically, in

1 MR. GILLIAM: Okay. Wasn't sure. So
2 that's another representative?

3 MR. GREENFIELD: Yes, I believe so.
4 Mr. Cloutman, would you confirm on that? You are
5 on mute.

6 MR. CLOUTMAN: Now I am unmuted.
7 Sorry. What -- what was the question again, Matt?

8 MR. GILLIAM: Does the union have a
9 different designee for documents produced from
10 union officials' personal devices?

11 MR. CLOUTMAN: I don't know the answer
12 to that.

13 MR. GREENFIELD: Well, we -- so maybe
14 I can chime in. What we have is Drew Kennedy who
15 will be testifying for -- on behalf of certain
16 aspects of the request-for-production search,
17 et cetera. But -- but, I think, to the -- to the
18 extent your question goes, it sounds like it's
19 starting to get into attorney/client privilege and
20 work product as far as who took place in -- at the
21 advice and assistance of counsel on retrieving
22 documents.

23 MR. GILLIAM: I don't want to get into
24 that.

25 MR. GREENFIELD: Okay.

1 regard to the requests for production of documents.
2 There is an individual who will be brought later
3 named Drew Kennedy, who will be -- who will speak
4 about the initial request-for-production process.

5 Mr. Parrott did help with a subsequent
6 request for production, the one that Mr. Gilliam is
7 discussing that he was -- he had brought up to
8 Mr. Parrott, and so Mr. Parrott will be here to
9 testify to that. I will instruct Mr. Parrott to
10 limit his testimony to things that did not come
11 from -- at the advice or conversations with
12 counsel. But to the extent he can answer
13 Mr. Gilliam's questions outside of that, he should
14 do so.

15 MR. GILLIAM: Okay.

16 Q. (By Mr. Gilliam) Before moving to another
17 topic, I just had one other -- a couple other
18 questions. Mr. Parrott, do you know if Audrey
19 Stone attended the January 2017 women's march?

20 **A. Yes.**

21 Q. Okay. And -- and, yes, she did attend?

22 **A. Yes.**

23 Q. Okay. Do you know if she received lost
24 time?

25 **A. So let me look. I may be confusing the**

1 **two exhibits because the -- the Document 16 says**
2 **lost time for Audrey Stone.**

3 Q. Well, yeah, excluding -- not -- not
4 referencing Document 16, based on your knowledge,
5 do you know if Audrey Stone received lost time for
6 attending the January 2017 women's march?

7 **A. I don't recall specifically that.**

8 Q. Okay. Do you know if any flight
9 attendants received lost time for attending the
10 January 2017 women's march?

11 **A. So should the first document that you**
12 **asked me about, that P&L sheet, where -- if you --**
13 **if you will bear with me one moment. I don't know**
14 **where that --**

15 Q. Document 42, Page 9488.

16 **A. I think it's safe -- give me one moment,**
17 **please. Yup, there it is. Sorry. Take this -- so**
18 **on this Profit and Loss Detail, Line 6350, gross**
19 **lost time. So for the month of January, the total**
20 **lost time expense for the month for this committee**
21 **was \$486. And I don't have a detail out of how**
22 **that \$486 was -- like, this report doesn't say who**
23 **that went to.**

24 Q. Okay. Can you conclude that that -- that
25 amount went to at least one flight attendant as

1 if -- if one of the union officials is seeking
2 documents from other union officials, I don't see
3 how that's attorney/client privilege. I am not
4 asking about his communications with counsel about
5 -- about the timing. I am just asking when the
6 union requested it.

7 MR. GREENFIELD: Right. And if that
8 was done at the advice and timing of -- of legal
9 counsel, that would be protected.

10 MR. GILLIAM: The communication with
11 the counsel is protected.

12 MR. CORRELL: Isn't this the same
13 argument you made, Counsel, in your argument
14 regarding the subpoena to Ms. Stone where you said
15 Ms. Carter's actions at your direction, we couldn't
16 know about it?

17 MR. GILLIAM: No, I don't think it is.

18 MR. CORRELL: Seems similar to me.

19 MR. GILLIAM: No, I actually didn't
20 make that argument.

21 MR. CORRELL: You asserted privilege
22 and that's what the court withheld the documents
23 on. I just want to know. Because if this is not
24 privileged, then we need to go back to the court
25 about the stuff with Ms. Stone.

1 lost time?

2 MR. GREENFIELD: Objection. Vague.

3 **A. Yes.**

4 Q. (By Mr. Gilliam) Okay. All right. Now,
5 at some point, the union reached out to certain
6 officials to gather info from their personal
7 electronic devices; is that correct?

8 **A. So I believe that was -- was this the**
9 **recent -- the recent request that we -- that was**
10 **sent out?**

11 Q. Yes, yes.

12 **A. So, yes.**

13 Q. Now, when did the union issue that
14 request?

15 MR. GREENFIELD: I am going to object
16 to that to the extent of any conversations -- the
17 timing and content of when those occurred as
18 attorney/client privilege.

19 MR. GILLIAM: How is that
20 attorney/client privilege?

21 MR. GREENFIELD: That you are talking
22 about a communication about when and in the content
23 of what happened with -- as part of a lawsuit.
24 Explain how it's not, sir.

25 MR. GILLIAM: Well, I mean, if he's --

1 MR. GILLIAM: I -- I think there are
2 two different issues. One involved my
3 communications with -- with my client and
4 specifically about my communications. This
5 involves --

6 MR. CORRELL: No, no. We asked for
7 information about Ms. Carter's communications with
8 other people. And you guys asserted protection
9 over that. And that's what Mr. Greenfield is
10 arguing, isn't it? Communications by an agent at
11 the direction of counsel.

12 MR. GILLIAM: No, I -- I think they
13 are two different things.

14 MR. CORRELL: We're on record, right?

15 MR. GILLIAM: Yes.

16 MR. CORRELL: I want this whole piece
17 on record.

18 MR. GILLIAM: I'm -- I'm asking who
19 the union communicated with for its collection of
20 documents.

21 MR. GREENFIELD: Right. And who the
22 union communicated with on its collection of
23 documents is something that was done at advice of
24 counsel.

25 MR. GILLIAM: Okay. Well, I -- maybe

1 I am missing something, but, to me, they seem like
2 two different things.
3 Q. (By Mr. Gilliam) Okay. For the sake of,
4 I guess, moving on, I'm going to -- I'm going to
5 move on here.
6 Now, who did the union receive
7 information from after it requested documents?
8 **A. I am sorry. Can you -- can you state that**
9 **again? I am sorry, Matt.**
10 Q. Yeah. When the union requested documents
11 from union officials, who did it receive documents
12 from?
13 **A. I don't -- I don't know specifics off the**
14 **top of my head.**
15 Q. Okay. Who did the union send the request
16 for information to?
17 MR. GREENFIELD: Objection. Again,
18 Matt, that's -- that's the same thing we're talking
19 about. It's who -- who the -- the request for
20 production, who was sought out is all done at
21 advice of legal counsel.
22 MR. GILLIAM: Okay. All right. Well,
23 I guess, what I am trying to get at here -- let's
24 see.
25 Q. (By Mr. Gilliam) If I could direct you to

1 Document 43.
2 **A. Give me one second. It's -- the email is**
3 **already buried. 43. Okay. I have Document 43 up.**
4 Q. (By Mr. Gilliam) Okay. And if you could
5 look -- look through these. You don't have to read
6 every page. I will ask you general questions.
7 **A. This is that -- do you want me to review**
8 **the 31-page document? Just to make sure I am on**
9 **the right one.**
10 Q. Yeah. The first page -- well, there's --
11 in the bottom right-hand corner, it says, TWU
12 556-6655.
13 **A. Okay. Yes. Okay. I have that document**
14 **pulled up. Okay.**
15 Q. And, basically, I want to know if you're
16 -- if you're familiar with -- with these documents.
17 **A. I am not.**
18 Q. Okay. All right. Do you know if these
19 were produced in response to the recent requests
20 for documents from union officials' personal
21 electronic devices?
22 **A. I don't know that.**
23 Q. Okay. All right. Let's see.
24 MR. GILLIAM: I think that's all I
25 have for now.

1 MR. GREENFIELD: Well, for now, are --
2 is that your way of saying that you are releasing
3 the witness?
4 MR. GILLIAM: Yes.
5 MR. GREENFIELD: Okay.
6 MR. GILLIAM: Can we go off the
7 record?
8 MR. GREENFIELD: We can.
9 (End of Proceedings, 3:00 p.m.)
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1 CHANGES AND SIGNATURE
2 WITNESS NAME: JOHN PARROTT
3 DATE OF DEPOSITION: NOVEMBER 30, 2020
4 PAGE LINE CHANGEREASON
5 _____
6 _____
7 _____
8 _____
9 _____
10 _____
11 _____
12 _____
13 _____
14 _____
15 _____
16 _____
17 _____
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1 I, JOHN PARROTT, have read the foregoing
2 deposition and hereby affix my signature that same
3 is true and correct, except as noted above.
4
5

6 _____
7 JOHN PARROTT

8
9 THE STATE OF _____
10 COUNTY OF _____

11 Before me, _____, on this day
12 personally appeared JOHN PARROTT, known to me (or
13 proved to me under oath or through _____) to
14 be the person whose name is subscribed to the
15 foregoing instrument and acknowledged to me that
16 they executed the same for the purposes and
17 consideration therein expressed.

18 Given under my hand and seal of office this _____
19 day of _____, 2020.

20 _____
21 NOTARY PUBLIC IN AND FOR THE
22 STATE OF _____

23 MY COMMISSION EXPIRES: _____
24
25

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1 _____xx was requested by the deponent and/or a
2 party before completion of the deposition.
3 _____ was not requested by the deponent and/or
4 a party before the completion of the deposition.

5 I further certify that I am neither
6 attorney nor counsel for, nor related to or
7 employed by any of the parties to the action in
8 which this deposition is taken and further that I
9 am not a relative or employee of any attorney of
10 record in this cause, nor am I financially or
11 otherwise interested in the outcome of the action.

12 The amount of time used by each party at
13 the deposition is as follows:

14 Mr. Gilliam - 1:04 hours/minutes
15

16 Subscribed and sworn to on this 8th day of
17 December, 2020.



18 _____
19 CHARIS M. HENDRICK
20 CHARIS M. HENDRICK, CSR # 3469
21 Certification Expires: 10-31-21
22 Bradford Court Reporting, LLC
23 7015 Mumford Street
24 Dallas, Texas 75252
25 Telephone 972-931-2799
Facsimile 972-931-1199
Firm Registration No. 38

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1 REPORTER'S CERTIFICATION
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE NORTHERN DISTRICT OF TEXAS
4 DALLAS DIVISION
5 CHARLENE CARTER)
6)
7) CIVIL ACTION NO.
8 VS.) 3:17-CV-02278-X
9)
10)
11 SOUTHWEST AIRLINES CO., AND)
12 TRANSPORT WORKERS UNION OF)
13 AMERICA, LOCAL 556)
14)
15)
16)
17)
18)
19)
20)
21)
22)
23)
24)
25)

1 CONFIDENTIAL
2 TWU LOCAL 556 30(b)(6)
3 DEPOSITION OF JOHN PARROTT
4 NOVEMBER 30, 2020
5 (REPORTED REMOTELY)
6
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25

1 I, CHARIS M. HENDRICK, Certified Shorthand
2 Reporter in and for the State of Texas, do hereby
3 certify to the following:

4 That the witness, JOHN PARROTT, was by me
5 duly sworn and that the transcript of the oral
6 deposition is a true record of the testimony given
7 by the witness.

8 I further certify that pursuant to Federal
9 Rules of Civil Procedure, Rule 30(e)(1)(A) and (B)
10 as well as Rule 30(e)(2), that review of the
11 transcript and signature of the deponent:

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